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March 26, 2019

VIA ECF

The Honorable Analisa Torres
United States District Court in and for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Jessica Mirshak v. City of New York et. al. v. Xiao Nan Chen
Docket No.: 18-cv-00374 (AT)

Dear Judge Torres:

We represent Defendants/ Third-Party Plaintiffs City of New York and Karolina Kondzielewska Abramowicz (collectively for this letter “the City”) in the above-referenced action. I respectfully submit this joint letter to request an extension of the fact discovery and expert discovery deadlines to May 29, 2019 and June 28, 2019, respectively, and a corresponding extension of the interim dates set forth in the Civil Case Management Plan and Scheduling Order. The current deadlines for fact and expert discovery are March 29 and April 30, respectively. A case management conference is scheduled for April 16, 2019.

This is the parties’ fifth request for an extension of the discovery deadlines, and all parties consent to this request. The Court granted the parties’ prior requests for an extension.

This personal injury action arises from a three-vehicle motor vehicle accident that occurred on November 16, 2017. Plaintiff was a passenger in the vehicle owned and operated by Defendant/ Third-Party Defendant Xiao Nan Chen.

The parties have continued to work diligently to complete the additional discovery related to the new medical providers and additional care and treatment plaintiff disclosed in her Supplemental Rule 26 Disclosure. At this time, the discovery outstanding is the completion of two independent medical examinations of plaintiff. Both doctors have been designated. One examination is scheduled for April 9, 2019, and the parties are still waiting for the second

examination to be scheduled. The aim is to have both examinations completed by the end of April.

For these reasons, the parties respectfully request that the fact and expert discovery deadlines, and the interim deadlines, be extended.

Respectfully submitted,

/s/ Daniela Jampel

Daniela Jampel (DJ-0925)

cc: Amy Rosenbloom, Esq. (via ECF)
Frank Cerniglia, Esq. (via ECF)
Yifei He, Esq. (via ECF)

GRANTED. The deadline to complete fact discovery is EXTENDED to **May 29, 2019**. The deadline to complete expert discovery is EXTENDED to **June 28, 2019**. The case management conference scheduled for April 16, 2019 is ADJOURNED to **June 18, 2019**, at **12:00 p.m.** By **June 11, 2019**, the parties shall file their joint status letter. *See* ECF No. 38 ¶¶ 15-16.

SO ORDERED.

Dated: March 26, 2019
New York, New York



ANALISA TORRES
United States District Judge